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ATTORNEYS FOR
MARK KESEL

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:)	Case No. 10-41653 RJN
MARK KESEL)	CHAPTER 11
Debtor.)	
)	Date:
)	Time:
)	Place: 1300 Clay Street
)	Courtroom 220
)	Oakland, CA 94612
)	Judge: Randall J. Newsome

**DECLARATION OF OLEG TACHKOV IN SUPPORT OF THE APPLICATION TO
EMPLOY JEFFREY I. KAPLAN OF KAPLAN GILMAN & PERGAMENT, LLP AS
SPECIAL COUNSEL FOR DEBTOR UNDER 11 U.S.C. 327(e)**

I, Oleg Tachkov, declare as follows:

1. I am a member of NeoVision, LLC. The other member of NeoVision, LLC is Michael Genkin. Debtor, Mark Kesel, is not a member of NeoVision, LLC but he does help us with some bookkeeping work on a non-paid basis.
2. Mr. Genkin and I have known Mark Kesel for many years and we know him to be an honest, trustworthy and honorable person. We were shocked and disappointed when the Applied Materials judgment was entered against him. We believe this judgment is incorrect,

1 unfair and a terrible miscarriage of justice. For those reasons, we authorized NeoVision, LLC to
2 contribute funds to retain attorney Jeffrey Kaplan to represent Mr. Kesel and his co-defendants,
3 Boris Kesil, Elik Gershenzon and Multimetrixx, LLC, to appeal this judgment in the Federal
4 Circuit Court.

5 3. NeoVision, LLC has contributed the sum of \$30,000 for Mr. Kaplan to prosecute this
6 appeal. NeoVision, LLC contributed these funds to retain Mr. Kaplan out of concern and respect
7 for our friend and colleague, Mark Kesel. NeoVision, LLC has no expectation and no intention
8 of being repaid all or any part of these funds.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct.

11 Executed this 29th day of April, 2010 at Walnut Creek, California.

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13 _____/s/ Oleg Tachkov_____
14 Oleg Tachkov
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